UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORKX	
LEON D. BLACK,	
Plaintiff, -against-	Case No.: 1:21-cv-08824-PAE
GUZEL GANIEVA, WIGDOR LLP, AND JOHN DOES 1-3,	NOTICE OF MOTION TO DISMISS
Defendants.	

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Max Gershenoff dated January 7, 2022 and the exhibits attached thereto, and all prior pleadings and proceedings heretofore had herein, Defendant Wigdor LLP, by its counsel Rivkin Radler LLP, will move this Court on a date to be determined by the Court for an Order dismissing Plaintiff Leon D. Black's First, Second, and Third Causes of Action pursuant to Fed. R. Civ. P. 12(b)(6) and 9(b), along with all other relief that the Court deems necessary and proper.

PLEASE TAKE FURTHER NOTICE that any papers in opposition to this motion shall be served in accordance with Local Civil Rule 6.1.

Dated: Uniondale, New York January 7, 2022

Respectfully submitted,

RIVKIN RADLER LLP
Attorneys for Wigdor LLP

/s/ Max Gershenoff /s/ Janice DiGennaro

Max Gershenoff Janice J. DiGennaro

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TO: All parties and counsel of record (via ECF)